

13. The term "real estate" shall mean and include, but not be limited to the following: land, buildings, a house, dwelling place, condominium, cooperative apartment, office or commercial building, including those located outside the United States.
14. The term "release" shall mean any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment, including the abandonment or discarding of any Container or other closed receptacle containing any hazardous substance pollutant, or contaminant.
15. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA or RCRA, in which case the statutory definitions shall apply.

### REQUEST FOR INFORMATION

#### General Information about the Company

1. a. State the correct legal name of the Company. *ERM has a number of entities in the U.S. (e.g., ERM Consulting & Engineering, Inc., Environmental Resources Management Southwest, Inc.). We have no records that would connect any of them to this matter.*
- b. Identify the legal status of the Company (corporation, partnership, specify if other) and the state in which the Company was organized.  
*See above*
- c. State the name(s) and address(es) of the officer(s) of the Company.  
*See above*
- d. If the Company has subsidiaries or affiliates, or is a subsidiary of another organization, identify these related companies and state the name(s) and address(es) of the officer(s) of those organizations. Provide the same information for any further parent/subsidiary relationships.  
*See above*
- e. If the Company is a successor to, or has been succeeded by, another, identify such other company and provide the same information requested above for the predecessor or successor company.  
*See above*
- f. If the Company transacted business with SBD in the name of an entity not already disclosed, give the name of such entity and state its relationship to the Company. *We are not aware of any ERM entity transacting any business with SBD on this matter.*
2. a. Describe in detail the nature of your Company's business during the years 1974 to the present. If the nature of the business has not been constant, describe the changes that have occurred, including any name changes, and when they occurred. *We are an environmental & sustainability consulting firm.*



- b. Describe your Company's operations from 1974 to the present and identify all chemicals used or produced as a result of your Company's operations during that period, including any chemical substances used to clean equipment or machinery and the nature and chemical constituents of all waste streams and their disposition. *See above.*

**Company's Relationship to Superior Barrel and Drum ("SBD")**

3. a. State whether the Company or any Company facility conducted any business transactions with SBD for the disposal, treatment, or storage of any barrels, drums, or other containers (hereinafter collectively referred to as "Containers"). *We are unaware (after a diligent and exhaustive search) of any connection.*
- b. If so, identify each such facility and describe the relationship between the Company and SBD, including the nature of services rendered or products sold to the Company; *To the extent you have any documentation in addition to the Superior 1998 transaction detail and the Superior Barrel Drum customer list you sent, we would be happy to continue investigations further but at this time none of our employees are able (and our document management system is not able) to identify any thing that would be of any use to the EPA in this matter.*
- c. Provide copies of any contracts or agreements between the Company and SBD;
4. a. For each facility identified in Question 3, state the nature of the operations conducted at the facility, including the time period in which the facility operated;
- b. State the name, address, and current RCRA Identification Number of each facility; *We searched our old card files and found nothing.*
5. For each transaction between the Company and SBD, provide the following information, which may be provided in tabular format. *See above and we have nothing in our EPA files noting this type of work.*
- a. Identify the specific dates of each transaction and the facility involved with each transaction. Where an exact date cannot be provided for a transaction, provide an approximation by month and year; *We also searched our entire global project numbering system and found nothing.*
- b. Identify the number of Containers that were the subject of each such transaction;
- c. Generically describe each Container that was the subject of each such transaction, including the Container capacity and type (example: 55-gallon closed head steel drums, etc.);
- d. Identify the intended purpose and nature of each such transaction (example: Company products sold to SBD, Company waste disposed of by SBD, Company products purchased from SBD, Services rendered to or

from the Company to or from SBD, etc.)

- e. State whether each Container that was the subject of the transaction contained any substance(s) at the time of the transaction. As to each Container that contained any substance:
- (1) Identify each such substance, including its specific chemical constituent(s), physical state, quantity by volume and weight, and other characteristics; and
  - (2) Provide all written analyses that may have been generated for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance;
6. Provide copies of all documents relating in any way to each transaction, including copies of delivery receipts, invoices, or payment devices. *See above*
7. Identify all persons who might have knowledge of the transaction or who had any responsibility regarding the transaction. *No persons have been identified with any such knowledge*
8. If you contend that any Container identified in response to Question 5, above, did not contain any substance at the time of the transaction, state whether such Container had previously been used by the Company to contain any substance, and if so: *N/A*
- a. Identify all substances previously contained within such Container, including its specific chemical constituent(s), physical state, and other characteristic(s); and
  - b. Provide as to such substance(s), all written analyses that may have been generated for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance;
9. Describe in detail any treatment of any Container that may have been performed by or on behalf of the Company prior to the time that the Container was transferred from the Company, including any process or procedure by which the Container was emptied or cleaned. *N/A*
10. If you sent any Container by means of any third party transporter, identify each such transporter, including the name and address of such transporter, and identify in which of the transactions such transporter acted.

11. Identify each person consulted in responding to these questions and all questions on which he or she was consulted. *Many ERM employees were involved and none have any definitive information that would point to ERM having any connection whatsoever with the site. Further, we have no accounting records*
12. Identify any other person or entity (e.g., individual, company, partnership, etc.) *from our* having knowledge of facts relating to the questions which are the subject of this inquiry. For each such person that you identify, provide the name, address, and telephone number of that person, and the basis of your belief that he or she has *earlier* such knowledge. For past and present employees, include their job title(s) and *Deltak* accounting description of the responsibilities. *system, which was more than 10 years ago. We do not believe we have any*
13. Supply any additional information or documents that may be relevant or useful to identify other sources who disposed of or transported Containers to the Site. *information or documents that would be at all relevant or useful in this matter, but we are of course willing to investigate any other leads you have + help in any way we can.*

**CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION**  
Superior Barrel and Drum Site, Elk, Gloucester County, New Jersey

State of Texas:

County of Travis:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or my response thereto should become known or available to me.

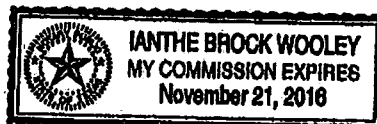
Marcus Ryan  
NAME (print or type)

Senior Counsel  
TITLE (print or type)

Marcus Ryan  
SIGNATURE

Sworn to before me this  
2nd day of February 2014

[Signature]  
Notary Public



**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

ERM Citycentre Four  
340 West Sam Houston Parkway North, Suite 500  
Houston, TX 77024  
Attn: David McArthur, CEO

2. Article Number

(Transfer from service label)

PS Form 3811, August 2001

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

*X. Olga Grumle* ☐ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

2011 11 11 11:11

3. Service Type

☒ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

7012 1640 0001 8519 3194

Domestic Return Receipt

102595-01-M-250

UNITED STATES POSTAL SERVICE



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

- Sender: Please print your name, address, and ZIP+4 in this box •

Bonnie Hriczko  
U.S. Environmental Protection Agency  
Removal Action Branch-(MS-211)  
Building 205  
2890 Woodbridge Avenue  
Edison, New Jersey 08837-3679

